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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)  
ECF Case

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ESTATE OF JOHN P. O'NEILL, Sr., et al.,

Plaintiffs,

04 CV 1923 (RCC)  
ECF Case

v.

AL BARAKA, et al.,

Defendants.  
\_\_\_\_\_

**STIPULATION EXTENDING THE TIME FOR PRINCE MOHAMED AL FAISAL AL SAUD TO RESPOND TO THE SECOND AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for Plaintiffs and for Defendant Prince Mohamed al Faisal al Saud ("Prince Mohamed"), subject to the approval of the Court, as follows:

1. Prince Mohammed was sent a Request for Waiver of Service of Summons by the above-referenced Plaintiffs ("O'Neill Plaintiffs") on or about January 6, 2005 at the address c/o Kamal Hussein Shukri, Hussein Shoukry Law Firm, 9<sup>th</sup> Floor-Adham Commercial Center, Medina Road, P.O. Box 667, Jeddah 21421, Saudi Arabia.
2. Prince Mohamed signed the Waiver of Service of Summons and thereafter returned it to an attorney for the O'Neill Plaintiffs.
3. The present due date for Prince Mohamed to respond to the Second Amended Complaint ("Complaint") is April 6, 2005.

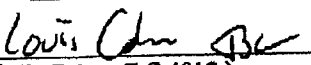

4. On January 18, 2005, the Court entered an Order ("January 18 Order") that, *inter alia*, granted Prince Mohamed's motions to dismiss the complaints against him in *Ashton, et al. v. Al Qaeda Islamic Army, et al.*, 1:02 CV 6977 (RCC) and *Federal Insurance Co., et al. v. Al Qaida, et al.*, 1:03 CV 6978(RCC) for lack of personal jurisdiction.

5. By letters dated March 11, 2005 and March 14, 2005, plaintiffs and defendants set forth their respective positions concerning the future structure of the litigation in light of the Court's January 18, 2005 Opinion and Order.

6. To avoid unnecessary briefing and motion practice and in the interests of judicial economy, the O'Neill Plaintiffs and Prince Mohammed agree to postpone Prince Mohammed's time to move to dismiss, answer or otherwise respond to the Second Amended Complaint until resolution of the issues addressed in the aforementioned letters. At that time, the O'Neill Plaintiffs and Prince Mohammed will file a separate stipulation and proposed order regarding a new briefing schedule, if appropriate after the Court's ruling.


March 22, 2005

Respectfully submitted,

 Louis R. Cohen (LC 4012) Wilmer Cutler Pickering Hale and Dorr LLP 2445 M Street N.W. Washington, D.C. 20037 Tel.: 202-663-6000 Fax: 202-663-6363	 Jerry S. Goldman (JSG 8445) Law Offices of Jerry S. Goldman & Associates, P.C. 111 Broadway, 13 <sup>th</sup> Floor New York, New York 10006 Tel: 212-242-2232 Fax: 212-346-4665
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SO ORDERED:

Dated: April 21, 2005  
 New York, New York

  
 The Honorable Richard Conway Casey  
 United States District Judge